

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
)	Chapter 7
)	
DECURTIS HOLDINGS LLC, <i>et al.</i> , ¹)	Case No. 23-10548 (JKS)
)	Adv. Pro No. 23-50413 (JKS)
)	
Debtors.)	
)	
INVICTUS GLOBAL MANAGEMENT LLC,)	
UNUMX, DECURTIS HOLDINGS LLC, and)	
DECURTIS LLC)	Civil Action No. 23-00919 (GBW)
)	BAP No. 23-0041
Appellants,)	
)	Civil Action No. 23-00970
v.)	Civil Action No. 23-00971
)	Civil Action No. 23-00972
CARNIVAL CORPORATION,)	Civil Action No. 23-00973
)	Civil Action No. 23-00979
Appellee.)	Civil Action No. 23-00981

STIPULATION AND [PROPOSED] ORDER REGARDING STAY OF DEADLINES

This stipulation (the “Stipulation”) is made by and among Alfred T. Giuliano, as the chapter 7 trustee (the “Trustee”) of DeCurtis Holdings LLC and DeCurtis LLC (the “Debtors”) and UnumX (“UnumX” and, collectively with Debtors, the “Appellants”) and Carnival Corporation (“Carnival” or “Appellee” and together with Appellants, the “Parties”) in connection with all seven of the above-captioned appeals.

WHEREAS, on October 4, 2023, this Court previously entered an Order approving the Parties' October 3, 2023 Stipulation to Stay of Mediation and Appellate Deadlines [Docket No. 22] in the above-captioned appeals for a period of twenty-days from the Court's Order;

1 The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's
federal tax identification number include: DeCurtis Holdings LLC (2384) and DeCurtis LLC
(9241). The location of the Debtors' service address in these chapter 11 cases is 3208 East Colonial
Drive, Suite C190, Orlando, FL 32803.
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WHEREAS, on October 13, 2023, this Court also entered an Order consolidating the bankruptcy appeals docketed at Civil Action Nos. 23-00919, 23-00970, 23-00971, 23-00972, 23-00973, 23-00-979, and 23-00981;

WHEREAS, Appellant Invictus Global Management, LLC stipulated to dismissal of bankruptcy appeals Civil Action No. 23-00970 (Docket No. 13) and Civil Action No. 23-00971 (Docket No. 13), which was granted by the Court on October 11, 2023, and thus Invictus Global Management, LLC is no longer a party to these appeals;

WHEREAS, the stay of deadlines pursuant to the Court's October 4, 2023 Order is set to expire on October 24, 2023;

WHEREAS, the Parties, by and through their undersigned counsel, have agreed to extend the current stay of the mediation and appellate deadlines in each of the above-captioned pending appeals while they continue settlement discussions;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the Parties, subject to the approval of the Court, as follows:

1. The foregoing recitals are incorporated herein.
2. Each of the above-captioned appellate cases pending in the District Court and any and all related mediation, motion practice, and briefing deadlines shall be stayed and continued for a period of thirty (30) days from the date the Court orders this stipulation.
3. For avoidance of doubt, the foregoing stay and continuance of appeal-related deadlines shall apply to Carnival's designations of additional items to be included in the record under Federal Rule of Bankruptcy Procedure 8009(a)(2) and Rule 8009-1 of the Local Rules for the U.S. Bankruptcy Court, District of Delaware.
4. The Parties are authorized to take all actions necessary to effectuate the relief granted pursuant to this Stipulation.

5. This Stipulation does not otherwise modify or affect the terms of this Court's Standing Order re: Procedures to Govern Mediation of Appeals from the United States Bankruptcy Court for this District dated July 19, 2023.

6. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Stipulation, and the Parties hereby consent to such jurisdiction to resolve any disputes or controversies arising from or related to this Stipulation.

Dated: October 24, 2023

**KLEHR HARRISON HARVEY
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Counsel to Carnival Corporation

SO ORDERED, this _____ day of October, 2023

United States District Judge Gregory B. Williams